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DG MOVE
European Commission
Brussels

Sent by e-mail: MOVE-TEN-T-policy-revision@ec.europa.eu

Your ref:
Our ref:

14th September 2010

Dear Sirs,

CONSULTATION ON THE FUTURE TRANS EUROPEAN NETWORK- TRANSPORT POLICY REVIEW – SCOTTISH GOVERNMENT RESPONSE

The Scottish Government welcomes the opportunity to respond to the European Commission's consultation on the future Trans European Network – Transport (TEN-T) policy.

Sustainable economic growth

The Scottish Government's overarching Purpose, as set out in our [Economic Strategy](#), is to create a more successful country, with opportunities for all of Scotland to flourish through increasing sustainable economic growth. Transport plays a critical role in delivering this: an efficient transport system can open up new markets, increase access to employment and help build a critical mass of business that can drive up competitiveness and deliver growth.

In support of our Purpose, we have produced our [National Transport Strategy](#) (NTS), which includes three key strategic outcomes which we think will best maximise transport's contribution to economic growth-

- improving journey times and connections;
- reducing emissions; and
- improving quality, accessibility and affordability.

We believe that sustainable growth should also be at the heart of EU policy. That is why we supported the general direction of the Europe 2020 strategy, and its high level aims to speed up the move towards a greener, more sustainable and more innovative economy. And it is why we support in principle the proposal to set the review of TEN-T policy in the context of Europe 2020, in particular to enable an integrated European transport system which supports the transition to a low carbon economy and the decarbonisation of transport.

Climate change

Climate Change is one of the most significant threats we face to economic stability. That is why Scotland is determined to act as a model of best practice through our Climate Change legislation and [Climate Change Delivery Plan](#), where we aim for at least 42% cuts in emissions by 2020 and 80% cuts by 2050. However, Scotland cannot tackle climate change alone, and addressing global warming should be an over-riding priority for all nations, and one which the EU should give clear lead.

Transport is a significant contributor to carbon emissions, yet it is widely regarded as being one of the most difficult areas in which to achieve substantial long term reductions. Undoubtedly, there is a tension between the desire to maximise the contribution that transport makes to sustainable economic growth through providing better connections and faster journey times, while at the same time minimising the impact on the environment of the emissions associated with increased travel.

Encouraging modal shift from road to rail, particularly freight, will certainly be helpful in reducing the overall level of transport emissions. In addition, the TEN-T policy should consider giving priority to measures which fall into the categories of technological enhancements, behavioural change and investment in sustainable modes of transport. Intelligent Transport Systems, for example, have a significant role to play in tackling congestion and climate change, and you may wish to consider the adopting of such technology as a requirement for accessing funding through the TEN-T policy.

We welcome the priority which the policy review gives to tackling climate change and environmental issues. In this respect, a coordinated approach across the Member States would be most effective, and you may wish to consider TEN-T as a vehicle through which this can be achieved in respect of transport.

Territorial cohesion

In our response to the Commission's Green Paper on Territorial Cohesion, we highlighted the importance of cohesion and equity as an objective of EU policy and the need for EU policy to demonstrate European added value. As recognised in the Treaty of Rome and reinforced by the Lisbon Treaty, peripheral parts of the EU face significant challenges, and the review of the TEN-T policy should recognise that remote areas continue to contribute to and benefit from economic growth.

We would support in principle the concept of a dual layer approach to the TEN-T network. However, the Commission must use the opportunity of the review to ensure that the peripheral areas of economic importance, such as Scotland, are better connected to the markets at the heart of Europe.

The coverage of Scotland in the current priority projects, which determine many of the decisions on where TEN-T financial support will be directed, is very limited. This does not reflect the devolution of powers to the Scottish Government, or the economic reality of today's Scotland and the important contribution it makes to the overall health of the European economy.

In support of our NTS, and as part of Scotland's long term development planning, we have produced our [Strategic Transport Projects Review](#) (STPR) which identifies our major transport investment priorities over the next 20 years. The Scottish Government is also currently undertaking a major review of ferry services throughout Scotland. These priorities not only tackle issues of national connectivity, but also direct connectivity with Europe - rather than via other parts of the UK - which has both an economic and environmental benefit. For example, the Grangemouth area contains Scotland's largest container port (approximately 9 million tonnes of cargo per year) with important European, Baltic and Global connections.

Our [National Planning Framework](#) (NPF) guides Scotland's development to 2030, setting out strategic development priorities in support of sustainable economic growth. It plays a key role in co-ordinating policies with a spatial dimension and will help to align strategic investment priorities. For transport, the NPF promotes the strategic outcomes set out in the NTS and incorporates the findings of the STPR. It recognises the mutually beneficial importance of strong economic links between Scotland and heart of the European market, with Scotland's position on the Atlantic seaboard making it a key area in responding to the changing geography of Europe and the development of European markets.

It is our strong view that the 'core' network should reflect the priorities described above, and among other things look to bring the peripheral areas such as Scotland closer to the heart of the European markets. We are of the view that the interests of added EU value would not be best served were the core network to be designed primarily to serve the area often referred to as the 'European core' i.e. mainland, central Europe.

We would be looking to include a number of additional routes in Scotland in both the comprehensive and core TEN-T networks, and would welcome early discussions with the Commission on this issue. We will as a matter of course be feeding into the UK Department for Transport as they look to develop the TEN-T network for the UK.

Funding instruments and legal framework.

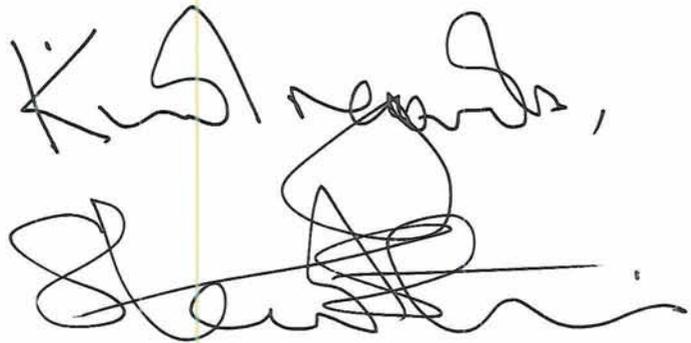
We would generally be supportive of the principle of improving the management of the EU funding instruments. Particularly in this time of constrained finances, it is vitally important that the EU does not lag behind in applying best value for money tests in its decision making processes for allocating funding through the TEN-T programme.

In our view, the areas where the EU budget for transport can best add value is in the development of EU wide strategies for decarbonisation and tackling climate change. In addition, there are opportunities to support territorial cohesion through informed investment in TEN-T.

In principle, we are supportive of the simplification of the regulatory framework which governs the TEN-T Guidelines and Financial arrangements. This aligns with our approach to regulation and our Better Regulation policy. As part of this simplification work, the Commission may wish to consider ways in which the process for applying for funding can be simplified.

I look forward to working closely with you on these issues over the coming months.

I am copying this letter to the UK Minister for Transport, the Minister for the Economy and Transport, Welsh Assembly Government and the Office of the First Minister and Deputy First Minister, Northern Ireland Assembly.

A handwritten signature in black ink, appearing to read 'K. A. Stevenson', with a large, stylized flourish below it.

STEWART STEVENSON